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**PACIFIC**  **TELESIS**  
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**OCT - 8 1996**

Federal Communications Commission  
Office of Secretary

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

Dear Mr. Caton:

Re: *CC Docket No. 94-102, RM-8143 - Revision of the Commission's Rules To  
Ensure Compatibility with Enhanced 911 Emergency Calling Systems*

On behalf of Pacific Bell Mobile Services, please find enclosed an original and six  
copies of its "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact  
me should you have any questions or require additional information concerning this  
matter.

Sincerely,



Enclosure

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**OCT - 8 1996**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

In the Matter of

Revision of the Commission's Rules  
To Ensure Compatibility with  
Enhanced 911 Emergency Calling Systems

CC Docket No. 94-102  
RM-8143

**COMMENTS OF PACIFIC BELL MOBILE SERVICES**

Pacific Bell Mobile Services hereby comments on selected Petitions for Reconsideration and/or Clarification filed in the above-captioned proceeding. The Commission's Rules relating to 911 service and commercial mobile radio service are very succinct and interrelated. The term "code identification" is very important since it determines whether a licensee must process a 911 call or whether a Public Safety Answering Point ("PSAP") has authority to determine whether or not to request that a 911 call be transmitted to it. Specifically, the rule states: "As of [one year after the effective date of the rule,], licensees subject to this section must process all 911 calls which transmit a Code Identification where requested by the administrator of the designated Public Safety Answering Point which is capable of receiving and utilizing the data elements associated with 911 service."<sup>1</sup>

Code Identification is defined as " a mobile Identification Number for calls carried over the facilities of a cellular or Broadband PCS licenses, or the functional

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<sup>1</sup> 47 CFR §20.18 (b).

equivalent of a Mobile Identification Number in the cases of calls carried over the facilities of a Specialized Mobile Radio Services.”<sup>2</sup>

Mobile Identification Number is defined as “a 34-bit number that is a digital representation of the 10-digit directory telephone number assigned to a mobile station.”<sup>3</sup>

As several Petitioners have pointed out, the definitions of code identification and mobile identification number are confusing and do not represent the current state of technology in the wireless industry.<sup>4</sup> For example, a MIN is not always a unique identifier.<sup>5</sup> Moreover, in the PCS-1900 technology, there is no MIN per se. There is an International Mobile Equipment Identifier (“IMEI”) and an International Mobile Subscriber Identity (“IMSI”) number, neither of which is the directory number.

CTIA, PCIA, and TIA all offer proposed changes to some definitions, including the term code identification. CTIA proposes that it be defined as: “any number used by a mobile station to identify itself to a network.”<sup>6</sup> PCIA proposes “a unique identifier assigned to a mobile unit, from which the serving network operator may determine the directory number (if any) assigned to the mobile station.”<sup>7</sup> TIA recommends, “the number used by a mobile station to identify itself to a network to obtain service.”<sup>8</sup>

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<sup>2</sup> 47 CFR §20.3.

<sup>3</sup> Id.

<sup>4</sup> PCIA, p. 6, TIA, pp. 2-9, CTIA, pp. 3-5.

<sup>5</sup> PCIA, p. 6.

<sup>6</sup> CTIA, p. 13.

<sup>7</sup> PCIA, p. 6.

<sup>8</sup> TIA, p. 5.

Since under the current rules the definition of code identification controls whether or not a PSAP has any say in whether it wants to receive non-code identified calls, the Commission should be aware that if code identification is defined too broadly, virtually all calls will fall within the definition and will be sent to the PSAP, including calls without a call back number. For example, under CTIA's definition any 911 call from our nonactivated handsets would be sent to the PSAPs because all of the handsets (whether activated or not) have a number to identify themselves to the network in order to reach Customer Care.<sup>9</sup> However, if they have not been activated, there is no call back number.

Alternatively, the Commission could create a separate rule dealing specifically with the issue of activated handsets where there is a call back number versus nonactivated handsets where there is no call back numbers rather than addressing the issue indirectly through the definitions.

Call back numbers are important to the PSAPs, and it should be clear in the Commission's rule whether and in what instances the PSAPs have a say in processing calls without call back numbers.

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<sup>9</sup> Since all of our handsets generally have both an IMEI and IMSI, either number may constitute code identification under a broad definition of code identification.

We respectfully request that the Commission carefully consider the impact of the definitions on its goals for the processing of wireless 911 calls in its order on reconsideration.

Respectfully submitted,

PACIFIC BELL MOBILE SERVICES

A handwritten signature in cursive script, reading "Betsy Stover Granger".

JAMES P. TUTHILL  
BETSY STOVER GRANGER

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Its Attorneys

October 8, 1996

## CERTIFICATE OF SERVICE

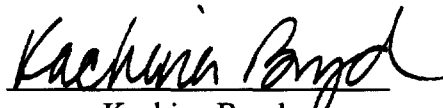
I, Kachina Boyd, do hereby certify that a copy of the foregoing COMMENTS OF PACIFIC BELL MOBILE SERVICES was mailed on this 8th day of October 1996, via first class United States mail, postage prepaid to the parties listed below.

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Kachina Boyd